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## **Evaluation Report**

### **The North Bronson Industrial Site Community Advisory Group Bronson, Michigan**

#### **Community Advisory Group Formation**

The North Bronson Industrial Site Community Advisory Group (CAG) was formed in the autumn of 1996 to address community concerns about cleanup of the North Bronson Industrial Site. CAG Chairman Scott McGraw said initial meetings with EPA and the Michigan Department of Environmental Quality quelled community concerns about site contamination, water quality issues, and potential health concerns, but the community remains concerned about the potential economic effects of the cleanup on Bronson and its small business community. There are concerns, because the city is a PRP, as are three of the community's eight industrial businesses.

McGraw said EPA sponsored an initial meeting to discuss formation of a community advisory group, suggested guidelines for membership, and provided guidebooks and informational brochures to help the group organize itself. McGraw said EPA was very straightforward in its approach by introducing the CAG concept, providing limited assistance, and leaving it to the community to take it from there. He said the EPA RPM who worked with the group was available to answer questions and offer informational materials, but took a "hands off" approach, which he felt was appropriate.

McGraw said EPA provided administrative support to the group. EPA prepared and distributed materials to inform residents about the community advisory group and how to participate. EPA's representative also kept a sign-up sheet from the initial meeting and used it to develop a mailing list of community advisory group members.

McGraw said the Community Advisory Group has about twelve members, who are volunteers and attended the initial organizational meeting. He was not sure whether the group wrote a formal mission statement. He said the group's mission is to inform the general public about the history and status of the Superfund project and to offer to the RPM its own and the community's viewpoints.

#### **Community Advisory Group Operations**

After its formation, the group's primary contact was Bill Harmon, the site's RPM from Michigan's Department of Environmental Quality (DEQ). McGraw said the group met regularly with Harmon, with whom they formed a close working relationship. Harmon provided project updates, answered questions, presented studies, and made presentations as requested by the community advisory group. McGraw said the CAG worked with Harmon each step of the way, and members appreciated the opportunity to see research studies conducted for his analysis at the same time Harmon did.

McGraw said the community advisory group met about once a month while the ROD was under development. Initial meetings focused on learning about the site's history. After that, McGraw said the RPM worked closely with the group as he was analyzing alternatives for preparation of a Record



of Decision. EPA helped by mailing out agendas and meeting notices for the first several meetings and helped maintain a mailing list. Meeting notices also were printed in the local newspaper, and McGraw said his newspaper ran many stories about site issues. He said a representative from the Michigan DEQ kept minutes for the first few meetings, after which the group kept its own minutes.

McGraw said EPA indicated that the purpose of a CAG was to gather information, inform the community, and offer feedback to the DEQ as it made its decision about a course of action for the cleanup. He said he understood a CAG was to meet only until the ROD was completed. McGraw said the group has not met since the ROD was proposed about eight months ago, and considers its work done. He noted that EPA accepted the ROD about a month ago. McGraw said a new project manager has been assigned to the project, but the CAG has not met with her, nor has she visited the site.

While it was still active, McGraw said the group held regular meetings and kept the community informed about the site through his newspaper. McGraw said Harmon listened to community input but made it clear that the community had no right to select a remedy for the site. He said that, while Harmon said remedy selection was "not a voting thing," community advisory group members realized that the group could give input directly to the decision-maker, and felt that Harmon was sensitive to the community's concern about the potential economic impact of the cleanup. He said the community was very satisfied with the remedy selected, which takes an innovative approach and will be much less costly than other options under consideration.

McGraw said the group has had sufficient access to technical advice. He said the group considered whether to apply to EPA for a Technical Assistance Grant (TAG) or for Technical Outreach Services for Communities (TOSC) assistance but decided not to do so because Harmon provided the group with all the technical advice it needed. Members also toured the site by themselves, and their observations helped to further allay concerns about the effects of past contamination.

McGraw said EPA's assistance in setting up an organizational meeting and providing materials was very helpful. After that, Michigan DEQ was the group's primary support. He said he would have liked EPA to help take and distribute meeting minutes but thought that EPA was not allowed to do so.

### **Overall Community Advisory Group Effectiveness**

McGraw said he was unsure how effective the community advisory group has been in getting everyone with an interest in site decisions involved in the process. He said he was discouraged that so few people in the community seemed interested in the site, probably because the site has been contaminated for 50 years. However, McGraw said he thinks the community has had more influence in the decision-making process because of the CAG.

McGraw said the community is satisfied with the decisions that Michigan DEQ made in the ROD. He said that the community's views were considered, but the DEQ may have chosen the same remedy even without the community's input. Nevertheless, McGraw said he thought the community

as a whole benefitted from the community advisory group's involvement in the decision-making process. Members gained knowledge, and the community benefitted from information disseminated through the media. For example, McGraw said, the newspaper could not have run a series of articles on the history of the site if the community advisory group had not been formed.

### **Wrap-Up/Other**

McGraw said he was glad to see progress toward cleanup of the North Bronson Industrial Site after fifteen years of inactivity. He praised the support provided to the community advisory group by the state's RPM, and said he thought that having an RPM as the primary contact and information source was "optimal" for a community advisory group.

McGraw concluded by saying that he felt the community advisory group had been good for his community. He said his group could have used additional help with preparing and distributing meeting notices and minutes, and said he thought EPA could take a more active role supporting community advisory groups without unduly influencing them. "You don't have to be totally hands-off to appear objective," he said.

### **Summary**

The major points raised by North Bronson Industrial Site Community Advisory Group chairman Scott McGraw during our telephone interview with him included the following:

- Community members were interested primarily with the economic impact of the proposed cleanup, and were less concerned about the environmental and potential health effects of the contamination.
- EPA introduced the community advisory group concept and provided assistance and informational materials for forming a CAG, but left it up to the community to organize itself. McGraw said he thought EPA's "hands off" approach was appropriate, but that the Agency could have provided more direct assistance to the group without compromising its independence.
- McGraw said he understood that a CAG's purpose was limited to gathering information, informing the community, and offering feedback during the ROD-development period only. For that reason, the North Bronson Industrial Site Community Advisory Group stopped meeting after the ROD was proposed to EPA.
- The North Bronson Industrial Site Community Advisory Group worked directly with the site's RPM from Michigan DEQ. McGraw said community advisory group members realized that the group could give input directly to the decision-maker, but the remedy decision rested with the DEQ.
- McGraw said the state RPM provided all the technical advice the community advisory group needed, and the group decided not to seek further assistance through EPA's TAG or TOSC

programs.

- McGraw said the community is satisfied with the decisions that Michigan DEQ made in the ROD. He felt the community's views had some influence, but that DEQ may have chosen the same remedy even without the community's input.
- McGraw praised the support provided to the community advisory group by the state's RPM, and said that having the site's RPM as the primary contact and information source was "optimal" for a community advisory group.
- He concluded that EPA can take a more active role supporting community advisory groups and still appear objective.

### **EPA Perspective**

*Comments from Rosita Clarke:* In essence, the stated comments are correct, but I would like to include some reasons to the actions that were taken regarding the CAG.

The North Bronson Site was a state lead for the RI/FS stage, which concluded with a ROD. Now that the ROD has been signed, the site will become a federal lead site if the PRPs agree to perform the work. U.S. EPA generally tends to have a "hands off" approach at state lead sites and provides assistance to the state as needed. The CAG also was set up so that it would have more interaction with the state, but community members were told that EPA was available when needed. Because the site is so close to Michigan DEQ, the group has had more interaction with them. Now that U.S. EPA has the lead for the site, these roles will change.

Also, I agree that not enough was discussed with the community regarding post-ROD activities. The CAG definitely is needed for the RD/RA stage, which will begin in early 1999. One reason that the CAG has not met since the ROD was approved is that there really has been little activity since then that would merit a meeting. That will change within the next months.

I will contact Scott McGraw to discuss his concerns and to explain that there is a place for the CAG throughout the RD/RA process.